

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ROBERT D. PRESS,

Plaintiff,

Index No. 21-v-10971 (VM)

-against-

**DECLARATION OF  
PATRICK J.  
PRIMAVERA IN  
SUPPORT OF MOTION  
TO DISMISS**

PATRICK J. PRIMAVERA,

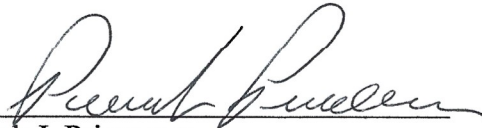
Defendant.

-----X

**PATRICK J. PRIMAVERA**, declares the following under the penalties of perjury pursuant to 28 U.S.C. § 1746:

1. I am the Defendant in this action.
2. Annexed hereto as Exhibit A and bates-stamped PRIMAVERA MTD 000001-PRIMAVERA MTD 000024 are true and correct copies of redacted e-mails between my attorney Jon A. Jacobson and SEC Attorneys Chang and Nicoleau relative to the SEC's investigation of the Plaintiff in this matter.

Dated: August 30, 2022

  
\_\_\_\_\_  
Patrick J. Primavera